

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

HELEN A. RUNGE,	:	
Plaintiff	:	
	:	
v.	:	CA No. 05-10849-RGS
	:	
WALTER J. KELLY; KERRY L.	:	
BLOOMINGDALE, M.D.; and	:	
SUNBRIDGE NURSING AND	:	
REHABILITATION CENTER,	:	
Defendants	:	

**PLAINTIFF, HELEN A. RUNGE'S, ASSENTED-TO MOTION
TO EXTEND THE TIME WITHIN WHICH SHE MAY FILE HER RESPONSE
TO THE MOTION TO DISMISS COUNTS I AND II
BY SUNBRIDGE NURSING & REHABILITATION CENTER**

AND NOW, COMES, Plaintiff, Helen A. Runge (hereinafter "Plaintiff" or "Runge") hereby requests that this Court grant an extension of time of one week for plaintiff in both the above-captioned action to file her opposition to Defendant Sunbridge Nursing & Rehabilitation Center's ("Sunbridge") Motion to Dismiss Counts I and II of the Complaint. In support of this Motion, the plaintiff states the following:

1. Plaintiff's lead counsel, Glenn R. Davis, Esq., was on vacation from August 1, 2005, through August 5, 2005.
2. Plaintiff's local counsel, Blake J. Godbout, Esq., was on vacation from August 8, 2005, through August 12, 2005.
3. As a result of Defendant Sunbridge filing the Motion on August 1, 2005, Plaintiff's counsel were not afforded the opportunity to discuss Defendant's Motion and Plaintiff's Response thereto.

Defendants have assented to this Motion.

WHEREFORE, the plaintiff respectfully requests that this Court grant her motion for an extension of time of one week, *i.e.* up to and including August 22, 2005, for Plaintiff to file her opposition to Defendant Sunbridge Nursing & Rehabilitation Center's Motion to Dismiss Counts I and II of the Complaint.

Respectfully submitted,

Dated: August 15, 2005

BLAKE J. GODBOUT & ASSOCIATES

By: /s/ Blake J. Godbout
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Pro Hac Vice

Attorneys for Plaintiff, Helen A. Runge

LOCAL RULE 7.1 CERTIFICATE

I, Blake J. Godbout, hereby certify that I have conferred with James S. Hamrock, Jr., Esquire, George C. Rockas, Esquire, and Michael Williams, Esquire, regarding the within Motion, all of whom assent to the Motion.

/s/ Blake J. Godbout
 Blake J. Godbout

CERTIFICATE OF SERVICE

I, Blake J. Godbout, hereby certify that a true copy of the above document was served upon each party by mailing a copy of same, postage prepaid, to all counsel of record.

/s/ Blake J. Godbout
 Blake J. Godbout